



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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MPR:ER  
F. #2019R00927

271 Cadman Plaza East  
Brooklyn, New York 11201

January 17, 2020

By ECF

The Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Genaro Garcia Luna  
Criminal Docket No. 19-576 (BMC)

Dear Judge Cogan:

The parties respectfully submit this proposed joint agenda for the January 21, 2020 status conference in the above-captioned matter.

- Complex Case Designation – The parties respectfully request that the Court designate this case as complex, pursuant to Title 18, United States Code, Section 3161(h)(7)(B). The government expects to produce voluminous discovery in this case related to the defendant's charged conduct, which spans nearly two decades. The defendant's alleged conduct is more fully described in the government's detention memorandum. See Dkt. No. 4. The expected discovery includes, but is not limited to, financial, property and naturalization records, seizure evidence, evidence obtained through requests to foreign countries pursuant to Mutual Legal Assistance Treaties and evidence recovered from seized electronic devices. The government also expects this case to include litigation pursuant to the Classified Information Procedures Act. In light of the foregoing, the parties request that the Court designate this case as complex.
- Discovery – The government is in the process of collecting and reviewing discovery for production to the defendant on a rolling basis.
- Assigned Counsel – Defense counsel expects to update the Court regarding the defendant's eligibility for appointment of counsel under the Criminal Justice Act.

- Next Status Conference – The parties respectfully request that the Court schedule the next status conference approximately 60 days from the date of the status conference.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
Michael P. Robotti  
Ryan Harris  
Erin Reid  
Assistant U.S. Attorneys  
(718) 254-7000

cc: Cesar de Castro, Esq.  
Clerk of the Court (BMC) (by ECF)